

NEW JERSEY HOUSING AND MORTGAGE FINANCE AGENCY has filed papers with the Court to object to the Confirmation of the Chapter 13 Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to object to the Confirmation of the Chapter 13 Plan, or if you want the Court to consider your views on the Objection, then on or before, you or your attorney must:

File with the Court an answer, explaining your position at:

**Clerk
U.S. Bankruptcy Court
401 Market Street, 2nd Floor
Camden, NJ 08101**

If you mail your response to the Court for filing, you must mail it early enough so that the Court will *receive* it on or before the date stated above.

You must also mail a copy to:

Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054

Isabel C. Balboa, Trustee
Cherry Tree Corporate Center
535 Route 38 - Suite 580
Cherry Hill, NJ 08002

Attend the hearing scheduled to be held on 06/13/2018 in the CAMDEN Bankruptcy Court, at the following address:

**U.S. Bankruptcy Court
401 Market Street, 2nd Floor
Camden, NJ 08101**

If you or your attorney do not make these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an Order granting that relief.

Date: June 7, 2018

/s/ Nicholas V. Rogers
Nicholas V. Rogers, Esq.
Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054
Tel: 856-813-5500 Ext. 42689
Fax: 856-813-5501
Email: nicholas.rogers@phelanhallinan.com

File No. 810070

Phelan Hallinan Diamond & Jones, PC

400 Fellowship Road

Mt. Laurel, NJ 08054

856-813-5500

FAX Number 856-813-5501

NEW JERSEY HOUSING AND MORTGAGE FINANCE AGENCY

In Re:

LAMONT N. WILLIAMS

Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

Chapter 13

Case No. 17-35377 - ABA

Hearing Date: 06/13/2018

The undersigned, Phelan Hallinan Diamond & Jones, PC, attorneys for Secured Creditor, NEW JERSEY HOUSING AND MORTGAGE FINANCE AGENCY, the holder of a Mortgage on debtor's residence located at 1162 COLLINGS ROAD, CAMDEN, NJ 08104 hereby objects to the Confirmation of the debtor's proposed Chapter 13 Plan on the following grounds:

1. Secured Creditor is NEW JERSEY HOUSING AND MORTGAGE FINANCE AGENCY.
2. Debtor, LAMONT N. WILLIAMS is the owner of the property located at 1162 COLLINGS ROAD, CAMDEN, NJ 08104.
3. Secured Creditor is in the process of drafting and filing a Proof of Claim. The approximate arrears are \$4,989.55.
4. Debtor's Plan currently provides for payment to Secured Creditor in the amount of \$3,400.00.
5. Debtor's Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5). Secured Creditor objects to Debtor's Plan as it is underfunded.
6. Debtor's Plan should be amended to fully fund the arrears owed to Secured Creditor.
7. Additionally, Debtor's Plan fails to provide for the full monthly post-petition payment owed to Secured Creditor under the terms of the Note and Mortgage. Secured

Creditor objects to any post-petition payment amount less than the full amount required. Accordingly, absent modification by the Debtor, confirmation of Debtor's proposed Plan should be denied.

WHEREFORE, NEW JERSEY HOUSING AND MORTGAGE FINANCE AGENCY respectfully requests that the Confirmation of Debtor's Plan be denied.

/s/ Nicholas V. Rogers
Nicholas V. Rogers, Esq.
Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054
Tel: 856-813-5500 Ext. 42689
Fax: 856-813-5501
Email: nicholas.rogers@phelanhallinan.com

Dated: June 7, 2018

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

810070
Phelan Hallinan Diamond & Jones, PC
400 Fellowship Road, Suite 100
Mt. Laurel, NJ 08054
856-813-5500
Attorneys for NEW JERSEY HOUSING AND
MORTGAGE FINANCE AGENCY

In Re:

LAMONT N. WILLIAMS

Case No: 17-35377 - ABA

Hearing Date: 06/13/2018

Judge: Andrew B. Altenburg, Jr

Chapter: 13

CERTIFICATION OF SERVICE

1. I, Shannon N. Ettl:

☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Phelan Hallinan Diamond & Jones, PC, who represents NEW JERSEY HOUSING AND MORTGAGE FINANCE AGENCY in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On June 7, 2018 I sent a copy of the following pleadings and/or documents to the parties listed below:

Objection to Plan

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: June 7, 2018

/s/ Shannon N. Ettl
Shannon N. Ettl

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
LAMONT N. WILLIAMS 1162 COLLINGS ROAD CAMDEN, NJ 08104	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
LAMONT N. WILLIAMS 9 OLD FARM ROAD SICKLERVILLE, NJ 08081	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
JEFFREY E. JENKINS, ESQUIRE JENKINS & CLAYMAN 412 WHITE HORSE PIKE AUDUBON, NJ 08106	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
STEPHANIE F. RITIGSTEIN, ESQUIRE JENKINS AND CLAYMAN 412 WHITE HORSE PIKE AUDUBON, NJ 08106	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
ISABEL C. BALBOA, TRUSTEE CHERRY TREE CORPORATE CENTER	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail

<p>535 ROUTE 38 - SUITE 580 CHERRY HILL, NJ 08002</p>		<p><input type="checkbox"/> Certified mail/RR</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)</p> <p><input type="checkbox"/> Other _____ (as authorized by the court *)</p>
<p>U.S. TRUSTEE US DEPT OF JUSTICE OFFICE OF THE US TRUSTEE ONE NEWARK CENTER STE 2100 NEWARK, NJ 07102</p>	<p>U.S. Trustee</p>	<p><input type="checkbox"/> Hand-delivered</p> <p><input checked="" type="checkbox"/> Regular Mail</p> <p><input type="checkbox"/> Certified mail/RR</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)</p> <p><input type="checkbox"/> Other _____ (as authorized by the court *)</p>

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.